## Federal Defenders OF NEW YORK, INC.

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David E. Patton Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

July 19, 2023

## **BY ECF**

Honorable Judge Edgardo Ramos United States District Judge Southern District of New York United States Courthouse 40 Foley Square New York, New York 10007

MEMO ENDORSED

Re:

**United States v. Humberto Bello** 

22 Cr. 163 (ER)

Dear Judge Ramos,

With the consent of the Government, I write to request that the Court extend the deadline for the defense's sentencing submission from July 21 to July 24 (with a corresponding extension of the Government's submission to July 31).

I am currently at NCDC Trial Institute and need additional time to prepare Mr. Bello's submission. Moreover, my office retained a forensic psychologist to evaluate Mr. Bello. This expert recently completed the report and I need additional time to incorporate the evaluation into the defense sentencing submission. As noted above, the Government consents to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Zawadi Baharanyi Assistant Federal Defender of New York

Counsel for Humberto Bello

cc: AUSA Alexander Li.

Defendant's sentencing submission is due July 24, 2023 and the government's submission is due July 31, 2023.

SO ORDERED:

HONORABLE EDGARDO RAMOS

United States District Judge

Dated: July 20, 2023